

1 DAVID W. SHAPIRO (New York State Bar No. 2054054)  
2 United States Attorney  
3 Attorney for Plaintiff  
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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA  
12 Plaintiff,

13 v.

14 RALPH LEE McGAUGHRAN,  
15 Defendant.  
16

CR • 02 - 0085  
Criminal No.

VIOLATIONS: 26 U.S.C. § 7203 --  
Willful Failure To File Tax Return

SAN FRANCISCO VENUE

17 INFORMATION

18 The United States Attorney charges:

19 COUNT ONE: (26 U.S.C. § 7203)

20 During the calendar year 1995 in the Northern District of California, the defendant

21 RALPH LEE McGAUGHRAN

22 who was then a resident of Redwood City, California, had and received a gross income of \$317,150.74;  
23 that by reason of such income he was required by law, following the close of the calendar year 1995  
24 and or before April 15, 1996, to make an income tax return to the District Director of Internal Revenue  
25 for the Internal Revenue Service Center, Western Region, at Fresno, California, stating specifically the  
26 items of his gross income and deductions and credits to which he was entitled; that knowing all of the  
27 foregoing, he willfully and knowingly failed to make an income tax return to the District Director of  
28 Internal Revenue, or to any other proper officer of the United States.

1 In violation of Title 26, United States Code, Section 7203.

2 COUNT TWO: (26 U.S.C. § 7203)

3 During the calendar year 1996 in the Northern District of California, the defendant

4 RALPH LEE McGAUGHRAN

5 who was then a resident of Redwood City, California, had and received a gross income of \$484,983.09;  
6 that by reason of such income he was required by law, following the close of the calendar year 1996  
7 and or before October 15, 1997, to make an income tax return to the District Director of Internal  
8 Revenue for the Internal Revenue Service Center, Western Region, at Fresno, California, stating  
9 specifically the items of his gross income and deductions and credits to which he was entitled; that  
10 knowing all of the foregoing, he willfully and knowingly failed to make an income tax return to the  
11 District Director of Internal Revenue, or to any other proper officer of the United States.

12 In violation of Title 26, United States Code, Section 7203.

13 COUNT THREE: (26 U.S.C. § 7203)

14 During the calendar year 1997 in the Northern District of California, the defendant

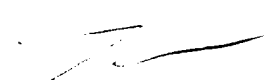
15 RALPH LEE McGAUGHRAN

16 who was then a resident of Redwood City, California, had and received a gross income of \$221,607.75;  
17 that by reason of such income he was required by law, following the close of the calendar year 1997  
18 and or before August 15, 1998, to make an income tax return to the District Director of Internal  
19 Revenue for the Internal Revenue Service Center, Western Region, at Fresno, California, stating  
20 specifically the items of his gross income and deductions and credits to which he was entitled; that  
21 knowing all of the foregoing, he willfully and knowingly failed to make an income tax return to the  
22 District Director of Internal Revenue, or to any other proper officer of the United States.

23 In violation of Title 26, United States Code, 7203.

24 DAVID W. SHAPIRO  
United States Attorney

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27 DOUGLAS J. WILSON  
Chief, Criminal Section

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Approved as to Form   
AUSA, THOMAS MOORE